

**Minnesota Pollution Control Agency**

May 6, 1993

Mr. Gerald Phillips  
Office of Underground Storage Tanks  
U.S. Environmental Protection Agency  
Region V (HRU-8J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Dear Mr. Phillips:

RE: New PP4 test Station for Testing cathodic Protection on Steel Tanks and Piping

At issue is Federal Rule 40 CFR 280.31(b), Qualifications for Corrosion personnel, which states that a qualified corrosion protection tester who can demonstrate education and experience in the measurement of cathodic protection of buried or submerged piping and metal tanks must be used to test the cathodic protection on buried metal tanks and piping.

Effective February 4, 1993, the Steel Tank Institute (STI) requires that all sti-P3 tank systems be equipped with the new PP4 test station which has a permanently installed reference cell buried beneath the tank and a permanently mounted test station.

The PP4 test station was developed for STI by William P. Carlson and James B. Bushman of Corpro Companies, Inc., Medina, Ohio. Of relevance here is Environmental Protection Agency's (EPA) earlier determination that a corrosion expert need not be used to design or install a field-designed corrosion protection~system for piping if the applicable part of the guidance document PEI RP-100 is followed because the document was written by a corrosion expert. (Refer to enclosure entitled, "Questions and Answers").

A logical corollary to this EPA ruling would be a determination that owners/operators of steel underground storage tank (UST) systems be required to monitor the cathodic protection on these systems if they are equipped with a PP4 system because it was designed by corrosion experts.

An optional testing device for the PP4 test system is available which allows the tank owner to test his own tank and piping for cathodic protection. Detailed instructions are included with the testing device which is a simple voltmeter which gives a qualitative pass-fail response.

Since the test is simple to perform, it is the position of the Minnesota Pollution Control Agency (MPCA) that the Federal Rule should be interpreted to allow the owner/operator or his designee to test the tank and piping for cathodic protection.

For purposes of comparison, I wish to point out that most release detection monitoring is done by the owner/operator without the requirement that they retain the services of an expert to do this for them. The MPCA believes that the Federal UST rule is set up as a self-monitoring program and in keeping with this, owners/operators should be allowed to do their own corrosion protection monitoring if their UST systems are equipped with PP4 test stations.

Since STI requires that all STI-P3 tank systems manufactured since February 4, 1993, be equipped with the permanent PP4 test system and since it is being promoted as a test-it-yourself system, an expedited ruling on this matter would be greatly appreciated.

Sincerely,

/S/

Beth G.. Lockwood, Supervisor  
Compliance and Assistance Unit  
Tanks and Spill Section  
Hazardous Waste Division

BGL: vb

cc: First Lieutenant Arthur R. Nash, Jr., Region V - Michigan  
Ms. Deloras Sieja, EPA Region V  
Mr. James McCaslin, Region V - Illinois  
Mr. John Gunter, Region V - Indiana  
Mr. Mike Williams, Region V - Ohio  
Mr. William J. Morrissey, Region V - Wisconsin